IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

PETER MORJAL,)	
Plaintiff,)	
VS.)) 12 CV 185	
The CITY OF CHICAGO, et al.,)) Judge LEFKOV	X
Defendants.)	

JOINT AGREED MOTION FOR ENTRY OF ORDER GRANTING ATTORNEYS' FEES

Plaintiff, PETER MORJAL, by his attorney, Torreya L. Hamilton, and Defendants FRANK PROANO, HAROLD BONE, DAVID MULLANY, DIANE PICCOLO and The CITY OF CHICAGO, by their attorney Jill Russell, Assistant Corporation Counsel, hereby request that this Court enter an order reflecting their agreement to settle Plaintiff's petition for appellate attorneys' fees. In support of this motion, the parties state as follows:

- 1. Plaintiff filed a petition for appellate attorneys' fees pursuant to Section 1988 on March 18, 2015. This petition is still pending before this Court.
- 2. The parties have reached an agreement to settle the appellate fees in the amount of \$40,000.00 (FORTY-THOUSAND Dollars).
- 3. Thus, the parties request that this Court enter an order granting attorneys' fees for the appeal entitled *Morjal v. City of Chicago*, 14-1365. The parties have agreed upon the Order attached as Exhibit A for this purpose.

WHEREFORE, the parties jointly request that this Court award attorneys' fees to Plaintiff's counsel in the amount agreed upon by the parties and enter an order granting those fees.

Respectfully Submitted,

<u>/s Torreya L. Hamilton</u> One of Plaintiff's Attorneys

Torreya L. Hamilton Kevin T. Turkcan, of counsel HAMILTON LAW OFFICE, LLC 53 West Jackson Boulevard, Suite 452 Chicago, Illinois 60604 312.726.3173 <u>/s Jill Russell</u> Attorney for Defendants

Jill Russell
Assistant Corporation Counsel
City of Chicago, Department of Law
30 North LaSalle Street, Suite 900
Chicago, Illinois 60602
312.742.7030